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United States Attorney

District of Oregon

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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 3:24-cv-00486-MO

v.

COMPLAINT IN REM
FOR FORFEITURE

**THIRTEEN (13) REAL PROPERTIES
(DEFENDANT REAL PROPERTIES),
LOCATED IN THE STATE AND
DISTRICT OF OREGON, STATE AND
DISTRICT OF WASHINGTON, AND
STATE AND DISTRICT OF
CALIFORNIA, WITH BUILDINGS,
APPURTENANCES, AND
IMPROVEMENTS;**

**\$558,558.25 UNITED STATES
CURRENCY, IN LIEU OF REAL
PROPERTY LOCATED AT 6222 NE
133RD WAY, VANCOUVER,
WASHINGTON; and**

**ALL FUNDS CONTAINED WITHIN
FIFTEEN (15) LPL FINANCIAL
ACCOUNTS AND FOUR (4) ONPOINT
COMMUNITY CREDIT UNION
ACCOUNTS (DEFENDANT
ACCOUNTS), *in rem*,**

Defendants.

Complaint in rem for Forfeiture

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Plaintiff, United States of America, for its Complaint *in rem* for forfeiture, alleges:

I.

This Court has subject matter jurisdiction, *in rem* jurisdiction, and venue pursuant to 21 U.S.C. § 881; 28 U.S.C. §§ 1345, 1355, 1356, and 1395; and 19 U.S.C. § 1610.

II.

Defendants, *in rem*, consist of the following:

a. Thirteen (13) pieces of real property described as:

Defendant Property 1: 56713 Dancing Rock Loop, Bend, Oregon 97707

Defendant Property 2: 1425 SE 148th Avenue, Portland, Oregon 97233

Defendant Property 3: 4686 W Powell Blvd., Unit 241, Gresham, Oregon 97030

Defendant Property 4: 56866 Enterprise Drive, Unit 10, Sunriver, Oregon 97707

Defendant Property 5: 5415 NE 134th Street, Vancouver, Washington 98686

Defendant Property 6: 812 Hawk Drive, Silverton, Oregon 97381

Defendant Property 7: 13109 NE 60th Avenue, Vancouver, Washington 98686

Defendant Property 8: 15398 SE Clark Street, Happy Valley, Oregon 97086

Defendant Property 9: 79360 Four Paths Lane, Indio, California 92203

Defendant Property 10: 6708 NE 223rd Circle, Battle Ground, Washington 98604

Defendant Property 11: 172 SE 117th Avenue, Portland, Oregon 97216

Defendant Property 12: 15337 SE Lewis Street, Happy Valley, Oregon 97086

Defendant Property 13: 11440 SE Brooks Road, Boring, Oregon 97009

(hereinafter, DEFENDANT REAL PROPERTIES, more fully described in Attachment A to the declaration).

DEFENDANT REAL PROPERTIES are now and during the pendency of this action will be within the jurisdiction of this Court. DEFENDANT REAL PROPERTIES are located in the states of Oregon, Washington, and California and are subject to forfeiture in the District of Oregon.

b. \$558,588.25 U.S. currency, in lieu of real property located at 6222 NE 133rd Way, Vancouver, Washington (“Defendant Currency”); and

c. All funds contained within fifteen (15) LPL Financial brokerage accounts and four (4) OnPoint Community Credit Union Accounts, hereafter referred to collectively as the “Defendant Accounts,” previously seized in this district pursuant to a seizure warrant, and more fully described in Attachment B to the declaration.

LPL Financial Accounts:

- 7026-0343 – in the name of Lebedenko Family Trust;
- 1067-0573 – in the name of PTC Cust 5305 SEP IRA FBO Sergey V Lebedenko;
- 2939-0592 – in the name of Yekaterina Dickinson;
- 3494-1593 – in the name of PTC Cust 5305 SEP IRA FBO Aliona Lebedenko;
- 3253-2037 – in the name of N650SM LLC;
- 5472-2209 – in the name of PTC Cust 5305 SEP IRA FBO Aliona Canche;
- 3126-2569 – in the name of Aliona Canche TOD Account;
- 5271-3034 – in the name of Sergey & Galina Lebedenko JT TEN TOD;
- 1165-4512 – in the name of PTC Cust 5305 SEP IRA FBO Galina Lebedenko;
- 7124-4613 – in the name of PTC Cust ROTH IRA FBO Aliona Canche;
- 6216-6310 – in the name of PTC Cust ROTH IRA FBO Marcus Lee Dickinson;
- 7480-6527 – in the name of Sergey & Galina Lebedenko JT TEN TOD;
- 2959-6702 – in the name of Yekaterina Dickinson TOD Account;
- 1674-7683 – in the name of PTC Cust 5305 SEP IRA FBO Yekaterina Lebedenko;
- 5721-7733 – in the name of PTC Cust ROTH IRA FBO Yekaterina Lebedenko.

OnPoint CCU Accounts:

- 1012808-1 Sergey and Galina Lebedenko Personal Savings
- 1012808-8 Sergey and Galina Lebedenko Personal Checking
- 1291730-22 Astra Car Service c/o Sergey Lebedenko Business Checking
- 1291730-1 Astra Car Service c/o Sergey Lebedenko Business Savings

DEFENDANT Currency and Defendant Accounts were seized in the District of Oregon and are now and during the pendency of this action will be within the jurisdiction of this Court.

III.

DEFENDANT REAL PROPERTIES, DEFENDANT CURRENCY, AND DEFENDANT ACCOUNTS, as described above, is property constituting or derived from proceeds obtained directly or indirectly as a result of violations of 18 U.S.C. § 1343, wire fraud, and is property involved in or traceable to property involved in a violation of 18 U.S.C. § 1956, laundering of monetary instruments. The Defendants, *in rem*, are therefore subject to forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(A) & (C), as more particularly set forth in the Declaration of Rachel Royston, Financial Investigator, marked as Exhibit A, attached and fully incorporated herein by this reference.

WHEREFORE, Plaintiff, United States of America, prays that due process issue to enforce the forfeiture of DEFENDANT REAL PROPERTIES, the \$558,558.25 U.S. currency, and the DEFENDANT ACCOUNTS, *in rem*; that due notice be given to all interested persons to appear and show cause why forfeiture of these Defendants, *in rem*, should not be decreed; that due proceedings be had thereon; that these defendants be forfeited to the United States; that the Plaintiff United States of America be awarded its costs and disbursements incurred in this action.

DATED: March 19, 2024.

Respectfully submitted,

NATALIE K. WIGHT
United States Attorney

/s/ Katie de Villiers
KATHERINE C. DE VILLIERS
Assistant United States Attorney

VERIFICATION

I, RACHEL ROYSTON declare, under penalty of perjury, pursuant to the provisions of 28 U.S.C. Section 1746, that I am a Certified Financial Investigator employed by the U.S. Attorney's Office in the District of Oregon, and that the foregoing Complaint *in rem* for Forfeiture is made on the basis of information officially furnished and upon the basis of such information the Complaint *in rem* for Forfeiture is true as I verily believe.

/s/ Rachel Royston
RACHEL ROYSTON, CFE, CAMS
United States Attorney's Office
District of Oregon